

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

This document relates to:

Lum, et al. v. Islamic Republic of Iran, No. 1:24-cv-07824 (GBD)(SN)

**NOTICE OF MOTION FOR ORDER AUTHORIZING SERVICE UPON DEFENDANT
ISLAMIC REPUBLIC OF IRAN IN ACCORDANCE WITH 28 U.S.C. § 1608(a)(4)**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and the Declaration of Jerry S. Goldman, Esq. (“Goldman Declaration”) Plaintiffs in in the above-captioned matter, by and through their counsel, Anderson Kill P.C., respectfully move the Court for an ORDER:

(1) determining that, for the purposes of this action, service of upon Defendant Islamic Republic of Iran (“Iran”) in accordance with 28 U.S.C. § 1608(a)(1) through (a)(3) is unavailable because there is no “special arrangement for service between” Plaintiffs and Iran; there is no “applicable international convention on service of judicial documents” between the United States and Iran; and there is no viable means for the Clerk of Court for the Southern District of New York to mail process to the head of the Ministry of Foreign Affairs of Iran, as mail service to Iran has been suspended;

(2) authorizing service of process upon Iran through diplomatic channels in accordance with 28 U.S.C. § 1608(a)(4) for sovereign defendants; and,

(3) granting to the Plaintiffs such other and further relief as this Honorable Court deems just and proper.

Dated: New York, New York
December 4, 2024

Respectfully submitted,

/s/ Jerry S. Goldman

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